

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

Civil Action No.: 2:21-cv-00310-JRG

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

**DECLARATION OF LANA SHIFERMAN IN SUPPORT OF
COMMSCOPE'S MOTION TO EXCLUDE PORTIONS OF THE EXPERT
TESTIMONY OF JONATHAN PUTNAM AND TODOR COOKLEV
UNDER FED R. EVID. 702 AND DAUBERT**

I, Lana Shiferman, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.
2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the Corrected Expert Report of Jonathan D. Putnam, dated September 3, 2022.
3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the Opening Expert Report of Todor Cooklev, Ph.D., dated August 29, 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
December 14, 2022, in Boston, Massachusetts.

/s/ Lana Shiferman

Lana Shiferman